



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JAMES E. JOHNSON
Corporation Counsel

KERRI DEVINE
JASMINE PAUL
Administrative Law
and Regulatory Litigation Division
212-356-2192
Facsimile: (212) 356-2019
kdevine@law.nyc.gov
jpaul@law.nyc.gov

October 4, 2021

BY ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Shaw-Nae Dixon at al.v. Bill De Blasio, et al., Civil Case No. 21-cv-5090

Dear Judge Cogan:

We are attorneys in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, counsel for defendants Bill De Blasio, as Mayor of the City of New York, and the City of New York. Pursuant to section III (B) (1) of Your Honor's Individual Practices, memorandums in opposition to motions must not exceed twenty-five pages. Defendants write to respectfully request permission for an additional three pages for their memorandum in opposition to Plaintiffs' motion for a preliminary injunction.

The brief that Plaintiffs have submitted in support of their motion for a preliminary injunction is thirty pages and the Complaint alleges twelve counts against Defendants. Given the length of Plaintiffs papers and the numerous counts they allege against Defendants, Defendants request three additional pages to fully address and oppose Plaintiffs' motion.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Jasmine Paul and Kerri Devine
Jasmine Paul and Kerri Devine

Assistant Corporation Counsel

cc: Ronald A. Berutti, Esq. (by ECF)
WEINER LAW GROUP LLP
Attorney for Plaintiffs
629 Parsippany Road
P.O. Box 438
Parsippany, NJ 07054